



13<sup>th</sup> April 2022

Penny Mills  
West Suffolk Council

By email only

---

*Thank you for requesting advice on this discharge of condition from Place Services' ecology advice services. This provides advice to planning officers to inform West Suffolk Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

---

**Application:** DCON(H)/09/1283  
**Location:** Land Nw Of Haverhill Anne Sucklings Lane Little Wratting Suffolk  
**Proposal:** Application to Discharge Conditions A2 (Alignment), A4 (Arboricultural Method Statement), A5 (Soft Landscaping) , A6 (Landscape and Ecological Management Plan), A8 (Archaeology) and A9 (Excavation and Ground Levels) of SE/09/1283

Dear Penny,

Thank you for consulting Place Services on the above discharge of conditions application.

With reference to the above named application and submitted documents received by Place Services on the 22/02/2022, asking for Ecology comments, our comments on the Planning Application as submitted are made below. This response relates to the discharge of condition A5 (Soft Landscaping) and A6 (Landscape and Ecological Management Plan).

We have referred to the:

- Guide to the Management Of Landscape And Ecological Areas At North West Haverhill Relief Road, Revision K ref JBA 17/364 (James Blake Associates, January 2022) (ie the Landscape and Ecological Management Plan)
- Detailed Soft Landscape Proposals for Infrastructure Areas JBA 17\364 Rev. J (James Blake Associates, January 2018) numvers 1 to 13.

**A5 (Soft Landscaping) – Recommend further revisions**

Condition A5 requires:

- A5 No development shall commence until there has been submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping for the site drawn to a scale of not less than 1:200. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities. The approved scheme of soft landscaping works shall be implemented not later than the first planting season following commencement of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority). Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species.

The locations of badger crossing points, Hibernacula, bird and bat boxes and bat hops should be shown on the landscape plans.

Furthermore, some of the other details set out below for Condition A6 will need to be reflected in the Detailed Soft Landscape Proposals for Infrastructure Areas, and vice versa, to ensure consistency. Therefore, we recommend that Condition A5 should not be discharged until the Landscape and Ecological Management Plan is finalised and approved.

**A6 (Landscape and Ecological Management Plan)- Recommend further revisions**

Condition A6 requires:

- A6 A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the link road. The content of the LEMP shall include the following.
- a) Description and evaluation of features to be managed.
  - b) Ecological trends and constraints on site that might influence management.
  - c) Aims and objectives of management.
  - d) Appropriate management options for achieving aims and objectives.
  - e) Prescriptions for management actions.
  - f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
  - g) Details of the body or organization responsible for implementation of the plan.
  - h) Ongoing monitoring and remedial measures.
- The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

We have referred to the the previous landscape and ecology comments from July 2020 and based on this, have the following observations.

Many of the points listed in the previous landscape and ecology comments from July 2020 have not been addressed in the latest revised version of the Guide to the Management Of Landscape And Ecological Areas At North West Haverhill Relief Road, Revision K ref JBA 17/364 (James Blake Associates, January 2022), from hereafter referred to as the LEMP (Landscape and Ecological Management Plan).

Previous landscape and ecology plan advised that *“There should be a plan showing the different habitat types to be managed so that the document is clear.”* This has not been included. It would be helpful if this plan also showed the location of the badger crossings, Hibernacula and bird and bat boxes, bat hops and any other mitigation or enhancement measures.

#### Badgers

The detailed design and location of the badger crossing points proposed have still not been provided (LEMP section 4.12).

#### Hedgerows

The LEMP recommends cutting over two years, but the advice in the Constraints Plan is to cut 1/3 each year, over three years. This needs to be adjusted.

Enhancement of hedgerows through wildflower seed/plug planting and management detailed in the LEMP is still not included in the LEMP.

Sensitive lighting: presumably this is dealt with elsewhere under a separate condition?

#### Breeding and wintering birds

*“Open space vegetated with shrubs, wildflowers and grasses to provide foraging for birds and mown paths to reduce trampling and disturbance”- “Mown paths through the POS between the existing and re-aligned BOAT would be of benefit”.*

Where is this open space mentioned above? Is this different from the site to the north of the roundabout on the relief road, which does not include paths or scrub included in the centre of it?

There are insufficient details of nest boxes in the LEMP- this should include the number, their location and specific type. It is still not clear from the report whether bird and bat boxes have already been placed on site.

*Skylarks:* No details of the compensatory off-site nest plots are included in the LEMP- is this provided elsewhere?

*Barn Owl:* Has a Barn Owl Nest box been included, as it has not been explicitly mentioned in the LEMP?

*“Significant area of tussocky grass provided potentially at the expense of calcareous grassland to support the CWS”- This still seems to be the case.*

There still appears to be a lot more Tussocky grassland than Chalk grassland, despite the fact that no reptiles were found.

### Amphibians

No details of ditch management is provided in the LEMP yet - this should be included.

### Sulphur Clover

Section 4.9 -The management regime advises one cut a year for the areas which contain Sulphur Clover; however, the Method Statement for Phase 6 recommends two cuts per year. We recommend that the chalk grassland should have two cuts per year once it is established. If the sulphur clover arisings are suitable, the ecological clerk of works may wish to consider using them on site for 'green hay'.

### Bats

Details of Bat hops have not been included within the LEMP.

### Monitoring

More details are required with respect to the ecological monitoring, particularly for the grassland habitats. The LEMP should include a definition of what successful grassland habitats will look like to aid future monitoring, using factors such as the cover of certain positive and negative indicator species, and bare ground.

### **Recommendation**

We recommend that Conditions 5 and 6 are not discharged until the above points have been addressed.

Yours sincerely,

**Emma Simmonds BSc (Hons) MCIEEM**

Ecology Consultant

Place Services at Essex County Council

**Place Services provide landscape & ecological advice on behalf of West Suffolk Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.